

PROSKAUER ROSE LLP
Elise M. Bloom
1585 Broadway
New York, New York 10036
(212) 969-3000
Attorneys for Defendant

ORIGINAL

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MELISSA ENG-HATCHER, on behalf of
herself and all others similarly situated

Plaintiff,

- against -

SPRINT NEXTEL CORPORATION; and
DOES 1 through 10, inclusive

Defendant.

**ECF CASE (THIS MOTION NOT
TO BE FILED ELECTRONICALLY)**

**MOTION TO ADMIT COUNSEL
*PRO HAC VICE***

Case No. 07-CIV-7350(BSJ)

PURSUANT TO RULE 1.3(c) of the Local rules of the United States District Courts for the Southern and Eastern Districts of New York, Elise M. Bloom, one of the counsel for Defendant and a member in good standing of the bar of this Court, hereby moves this Court at a date and time to be set by the Court, for an order allowing the admission *pro hac vice* of

Applicant's Name: Hunter R. Hughes, III
J. Timothy McDonald
Ashley R. Hurst
Firm Name: Rogers & Hardin LLP
Address: 229 Peachtree St., NE
International Tower, Suite 2700
City/State/ZIP: Atlanta, Georgia 30303-1601
Phone Number: (404) 522-4700
Fax Number: (404) 230-0948

HUNTER R. HUGHES, III is a member in good standing of the bar of the State of Georgia. J. TIMOTHY McDONALD is a member in good standing of the bar of the States of

New Jersey, Pennsylvania, Georgia and the District of Columbia. ASHLEY R. HURST is a member in good standing of the bar of the States of Florida and Georgia. There are no pending disciplinary proceedings against any of them in any State or Federal court.

Dated: October 9, 2007

Respectfully submitted,

PROSKAUER ROSE LLP

By: Elise M. Bloom
Elise M. Bloom
Gregory I. Rasin
1585 Broadway
New York, New York 10036
(212) 969-3410
(212) 969-2900 (fax)
ebloom@proskauer.com
Attorneys for Defendant Nextel

PROSKAUER ROSE LLP
 Elise M. Bloom
 Gregory I. Rasin
 1585 Broadway
 New York, New York 10036
 (212) 969-3000
Attorneys for Defendant

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

-----	X	
MELISSA ENG-HATCHER, on behalf of	:	ECF CASE (THIS MOTION NOT
herself and all others similarly situated	:	TO BE FILED ELECTRONICALLY)
	:	
Plaintiff,	:	DECLARATION OF ELISE M.
	:	BLOOM IN SUPPORT OF MOTION
- against -	:	TO ADMIT COUNSEL <i>PRO HAC</i>
SPRINT NEXTEL CORPORATION; and	:	<i>VICE</i>
DOES 1 through 10, inclusive	:	Case No. 07-CIV-7350(BSJ)
	:	
Defendant.	:	
-----	X	

ELISE M. BLOOM, under penalty of perjury, declares as follows:

1. I am a member of Proskauer Rose LLP, counsel for Defendant in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Hunter R. Hughes, III, J. Timothy McDonald and Ashley R. Hurst as co-counsel *pro hac vice* to represent Defendant in this matter.
2. I am a member in good standing of the bars of the States of New York and Georgia and was admitted to practice law in Georgia in 1982 and New York in 1985. I am also admitted to the bar of the United States District Court for the Southern District of New York, and I am in good standing with this Court.

3. Messrs. Hughes and McDonald and Ms. Hurst maintain their law office in Atlanta, Georgia where Messrs. Hughes and McDonald are members of the law firm of Rogers & Hardin LLP and Ms. Hurst is an associate with that firm.
4. I have found Messrs. Hughes and McDonald and Ms. Hurst to be skilled attorneys and persons of integrity. They are experienced in federal practice and are familiar with the Federal Rules of Procedure.
5. Accordingly, I am pleased to move their admission, *pro hac vice*.
6. I respectfully submit a proposed order granting the admission of Hunter R. Hughes, III, J. Timothy McDonald and Ashley R. Hurst, *pro hac vice*, which is attached hereto as Exhibit A.
7. I enclose as Exhibit B, a copy of a Certificate of Good Standing from the Georgia Bar for Mr. Hughes issued within the last 30 days. I also enclose as Exhibit C a copy of Certificates of Good Standing from the Georgia, Pennsylvania, New Jersey and District of Columbia bars for Mr. McDonald issued within the last 30 days, and as Exhibit D, Certificates of Good Standing from the Georgia and Florida Bars for Ms. Hurst issued within the last 30 days.
8. I declare the foregoing to be true and correct under the penalty of perjury pursuant to 29 U.S.C. § 1746.

WHEREFORE it is respectfully requested that the motion to admit Hunter R. Hughes, III, J. Timothy McDonald and Ashley R. Hurst, *pro hac vice* to represent Defendant as co-counsel in the above captioned matter, be granted.

Executed on: October 9, 2007

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Elise M. Bloom".

ELISE M. BLOOM

STATE BAR OF GEORGIA



Lawyers Serving the Public and the Justice System

Mr. Hunter R. Hughes III
Rogers & Hardin
2700 International Tower
229 Peachtree Street, N.E.
Atlanta, GA 30303-1637

CURRENT STATUS: Active Member-Good Standing

DATE OF ADMISSION TO PRACTICE: 12/01/1970

Attorney Bar Number: 375850

Today's Date: September 26, 2007

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition
N/A	N/A	N/A

The prerequisites for practicing law in the State of Georgia are as follows:

- Must be certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, which is the highest court needed for individuals to practice law in the State of Georgia.
- Enrolled with the State Bar of Georgia, which is an arm of the Supreme Court of Georgia.

Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. Attorneys may, upon application, apply for admission to the Supreme, District and State Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by **State Bar Rule 1-204**. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

STATE BAR OF GEORGIA

Official Representative of the State Bar of Georgia

HEADQUARTERS

104 Marietta Street, Suite 100
Atlanta, Georgia 30303
(404) 527-8700 ■ (800) 334-6865
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Tifton, Georgia 31793-1390
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FAX (229) 382-7435

STATE BAR OF GEORGIA



Lawyers Serving the Public and the Justice System

Mr. John Timothy McDonald
Rogers & Hardin
229 Peachtree St. Suite 2700
Atlanta, GA 30303-1601

CURRENT STATUS: Active Member-Good Standing

DATE OF ADMISSION TO PRACTICE: 06/12/1998

Attorney Bar Number: 489420

Today's Date: September 26, 2007

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition
N/A	N/A	N/A

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Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

John Timothy McDonald, Esq.

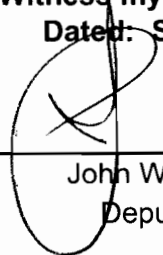
DATE OF ADMISSION

December 10, 1990

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal
Dated: September 27, 2007**



John W. Person, Jr., Esq.
Deputy Prothonotary

Supreme Court of New Jersey

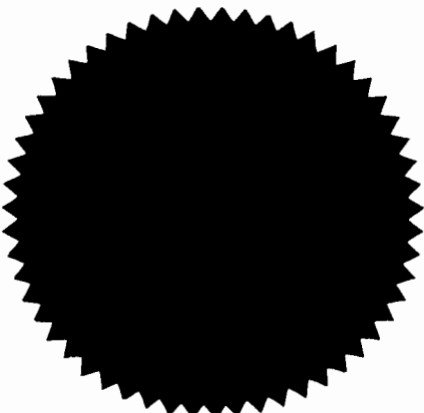


Certificate of Good Standing

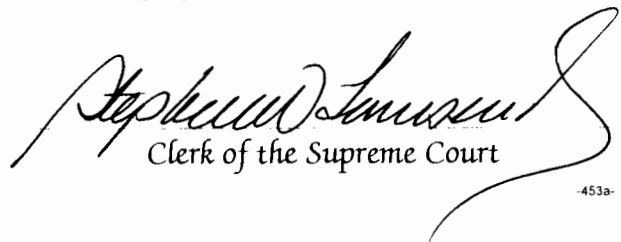
This is to certify that **JOHN T MC DONALD**
(No. **027201990**) was constituted and appointed an Attorney at Law of New
Jersey on **December 20, 1990** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
28TH day of **September** , 20 **07**


Clerk of the Supreme Court



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710


I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JOHN TIMOTHY MCDONALD

was on the 7TH day of DECEMBER, 1992
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on
September 28, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

STATE BAR OF GEORGIA



Lawyers Serving the Public and the Justice System

Ms. Ashley Robin Hurst
Rogers & Hardin LLP
229 Peachtree Street, Suite 2700
Atlanta, GA 30303

CURRENT STATUS: Active Member-Good Standing

DATE OF ADMISSION TO PRACTICE: 06/25/1997

Attorney Bar Number: 724123

Today's Date: September 26, 2007

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition
N/A	N/A	N/A

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The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

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WWW.FLORIDABAR.ORG

State of Florida)

County of Leon)

In Re: 164909
 Ashley Robin Hurst
 Rogers and Hardin, LLP
 229 Peachtree St., Ste. 2700
 Atlanta, GA

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on April 20, 1999.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 26th day of September, 2007.

A handwritten signature in black ink that reads "Willie Mae Shepherd". The signature is written in a cursive, flowing style.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/smith4:R10

Certificate of Service

I Brian J. Gershengorn, an attorney admitted to practice in the State of New York, hereby certify that on this date, I caused a true and correct copy of the Motion to Admit Counsel *pro hac vice* and the Declaration of Elise M. Bloom in support of the Motion to Admit Counsel *pro hac vice*, to be served by hand upon the following person: Robert J, Shapiro, 500 Fifth Avenue, 14th Floor, New York, New York 10110 and by UPS Next Day Air upon the following person: Joseph H. Meltzer, 280 King of Prussia Road, Radnor, PA 19087.

A handwritten signature in black ink, appearing to be 'B. Gershengorn', written over a horizontal line.

Brian J. Gershengorn, Esq.
PROSKAUER ROSE LLP
1585 Broadway
New York, New York 10036

Dated: October 9, 2007